

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Parts 1, 21, 73, 74 and 101 of	)	WT Docket No. 03-66
the Commission's Rules to Facilitate the	)	RM-10586
Provision of Fixed and Mobile Broadband	)	
Access, Educational and Other Advanced	)	
Services in the 2150-2162 and 2500-2690	)	
MHz Bands	)	
	)	WT Docket No. 03-67
Part 1 of the Commission's Rules – Further	)	
Competitive Bidding Procedures	)	
	)	MM Docket No. 97-217
Amendment of Parts 21 and 74 to Enable	)	
Multipoint Distribution Service and the	)	
Instructional Television Fixed Service	)	
Amendment of Parts 21 and 74 to Engage in	)	
Fixed Two-Way Transmissions	)	
	)	WT Docket No. 02-68
Amendment of Parts 21 and 74	)	RM-9718
Of the Commission's Rules With Regard to	)	
Licensing in the Multipoint	)	
Distribution Service and in the	)	
Instructional Television Fixed Service for the	)	
Gulf of Mexico	)	

**Reply Comments of Atlanta Interfaith Broadcasters, Inc.**

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October 23, 2003

## **Summary**

In its initial comments, Atlanta Interfaith Broadcasters, Inc. (AIB) supported the proposed reorganization of the ITFS spectrum into a high-power band for video services and a low-power band or bands for broadband services. However, AIB recommended that the new rules on the purposes and permissible service of ITFS should be changed to parallel those for noncommercial educational television stations. And, while AIB supported the idea of two-sided auctions, it suggested that the rights of existing ITFS licensees during and after the transition to the restructured spectrum needed to be clarified.

AIB believes the comments demonstrate the need for the Commission to expand the permissible use of ITFS. Licensees are using their facilities for a variety of noncommercial uses that fall outside a permissible use that would merely “further the educational mission of an accredited school.” What is more, the comments show that while there is a great deal of experience in using ITFS video, no one has a clear vision of what an ITFS broadband service will be. This is all the more reason for the Commission to allow the broadest possible use of the service. In any event, the standard proposed in the Notice of Proposed Rulemaking is unworkable.

Moreover, a restrictive definition of permissible use is directly contrary to the stated objective of this proceeding, which was to achieve the highest and best use of the spectrum. Indeed, as long as the rules restrict noncommercial licensees in how they may use ITFS, it would be patently unfair to permit commercial entities to hold ITFS licenses.

Finally, AIB notes that other parties share its concerns about how leases affect the Commission's decision here on matters such as two-sided auctions and about the transition process.

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**Reply Comments of Atlanta Interfaith Broadcasters, Inc.**

Atlanta Interfaith Broadcasters, Inc. ("AIB") submits these reply comments in the above-referenced proceeding pursuant to the Notice of Proposed Rulemaking (NPRM).

As stated previously, AIB is an ITFS licensee and the largest local faith-based cable network in the nation. Its unique blend of Catholic, Jewish, Moslem, Protestant, community, public service, and educational programs reaches more than 850,000 homes throughout metropolitan Atlanta over cable television systems. AIB has also become the

country's largest local producer of programming geared to the African-American community. AIB hopes the Commission will fashion new rules to enable AIB to continue and expand its service to its constituents and communities and to greater Atlanta.

#### **I. ITFS should be for all noncommercial educational uses.**

The permissible use rule should parallel that for noncommercial educational television stations and allow ITFS to be used for noncommercial educational, cultural, and entertainment purposes. The Commission's 1963 decision creating ITFS did not explain why the permissible use of the service was limited to instructional use.<sup>1</sup> Later, however, the Commission seized on this requirement as the *sine qua non* of ITFS to prevent it from being taken over by commercial interests. That is, by requiring that ITFS facilities transmit a minimum amount of instructional programming, which may now be as little as 5%, the Commission attempted to preserve a small part of what it thought was the original character of the service. It would be a mistake to continue to use the permissible use rule in this way.

Eligibility is, of course, different from permissible use. For certain services, including ITFS, the Commission's rules establish criteria for the eligibility to hold a license and separately limit how the license may be used. Thus, eligibility requirements for ITFS are contained in Rule 74.932 while permissible use is defined in Rule 74.931.<sup>2</sup>

AIB proposes no change in the current ITFS eligibility requirements. It does, however, urge the Commission take a positive, encouraging, and promotional approach to ITFS and to permit ITFS to be used for general noncommercial educational purposes, paralleling the rules for noncommercial educational television. This would achieve two

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<sup>1</sup> "Authorized instructional television fixed station channels must be used to transmit formal educational programming offered for credit to enrolled students of accredited school." 47 CFR 74.931(a)(1).

<sup>2</sup> 47 CFR 74.932 and 74.931 respectively.

things. First, it would allow educators to pursue innovative educational and community applications for ITFS. Second, it is the only rational way to develop a meaningful and flexible educational use of ITFS broadband.

**A. ITFS can be used for innovative, non-instructional, educational purposes.**

The comments here show how ITFS can be put to important noncommercial, non-instructional uses. For example, in addition to instructional programming, the Diocese of Brooklyn indicates its facilities are used “by many other agencies of the Diocese that offer educational services.” It describes a “community outreach” program, broadcasts by Catholic Charities “to members of the community to explain the assistance available,” and an “Ask the Doctor” program for hospitals.<sup>3</sup>

The Catholic Television Network also outlines substantial non-instructional educational use of ITFS, saying: “CTN is an association of Roman Catholic archdioceses and dioceses that operate many of the largest parochial school systems in the United States. CTN’s members use Instructional Television Fixed Service (“ITFS”) frequencies to distribute educational, instructional, inspirational, and other services to schools, colleges, parishes, community centers, hospitals, nursing homes, residences, and other locations.”<sup>4</sup> CTN’s public audience appears significantly larger than its student audience with CTN saying: “Collectively, CTN’s members serve over 600,000 students and 4,000,000 households throughout America.”<sup>5</sup>

Though not filing in this proceeding, the educational broadcaster Thirteen/WNET in New York City recently announced plans to combine its digital broadcast facilities and

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<sup>3</sup> Comments of Diocese of Brooklyn p. 2 (September 8, 2003).

<sup>4</sup> Joint Comments of the Catholic Television Network and the National ITFS Association p. 6 (September 8, 2003).

<sup>5</sup> Ibid.

its ITFS into an emergency information dissemination system. According to the press release,<sup>6</sup> the first step will be “to develop and analyze an urban testbed project utilizing Thirteen’s licensed Instruction Television Fixed Service (ITFS) spectrum for effective dissemination of information to first responders acting in national disaster situations” with funding from the National Technology Alliance (NTA). The same press release quotes a spokesperson for NTA to say: “This hybrid DTV/ITFS system, built on Thirteen’s licensed broadcast spectrum in New York City, will prototype a digital terrestrial infrastructure that will respond to terrorist incidents, natural disasters, or other emergencies prior to the actual need arising.”

These are but a few examples of how ITFS can and does serve important noncommercial, non-instructional purposes.

Nonetheless, the existing rules put obstacles in the paths of licensees by requiring minimum amounts of instructional programming. The rationale for this has been that the instructional use requirement prevents ITFS from being completely taken over by commercial operators. But in fact, the requirement is an anachronistic remainder from a bygone era of American education that has limited usefulness today.<sup>7</sup> Besides, the current rules treat non-instructional educational uses and commercial uses the same. They give licensees no incentive to put their facilities to other educational and community uses.

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<sup>6</sup> Attachment A.

<sup>7</sup> Of course, ITFS is being used for instructional programming. Indeed, the Illinois Institute of Technology, Stanford University, and Northeastern University plan to expand their use of instructional programming. However, these institutions of higher education, which use ITFS in distance learning programs for which tuition is charged, are in a different position from elementary and secondary schools, which do not. See, Comments of Illinois Institute of Technology p. 14 n. 20 (September 8, 2003); Joint Comments of Stanford University and Northeastern University pp. 2-3 (September 8, 2003).

What is more, the Commission has encouraged the widespread practice of leasing excess capacity with the phrase excess capacity being defined as all non-instructional use. As a result, ITFS is considered by some, particularly by commercial interests, as nothing more than a revenue-generator for educational institutions. And so, the Commission's policy, which allows the lease of excess capacity once a minimum amount of instructional matter is carried, often is viewed like the parent telling the child that he can have dessert once he eats the liver.

The net effect is that ITFS has evolved into a far different, and far narrower, service than the one first conceived in 1962. As mentioned in AIB's initial comments, one of the pioneering ITFS stations now relegates instructional programming to the wee hours of the morning. Teachers wanting to show such programs to their classes must record them for later viewing. It would be easier and more cost-effective if the school system mailed videotapes to the teachers than to use airwaves in this way. The unfortunate fact is that the current narrow rules on permissible use, coupled with liberal leasing, discourage innovative educational use and encourage waste of this valuable spectrum.

Little wonder that although the parties that filed here do not agree as to how the rules should be changed, they do agree that there should be change.

**B. No one has a clear vision yet of how ITFS broadband will be used in education.**

The NPRM sketched possible broadband ITFS services in only the most general terms. It gave little guidance, or vision, on how educators might use the service. Not surprisingly, there is confusion about exactly what kind of services will develop and how they will be used for educational purposes. Thus, educators have been asked to comment

on rules restricting the permissible use of a service, and yet no one knows what that service will be.

History suggests that it is difficult to predict how this spectrum will be used if the rules are changed. The rules were changed only five years ago in the Two-Way Order, where the Commission declared it had opened the way for ITFS to be used as a “high-speed and high capacity data transmission and Internet service.”<sup>8</sup> If this proceeding had been started four years ago, ITFS would have been hailed as ideally suited for the so-called Third Generation wireless or 3G service – which was far from “high-speed” by today’s standards.

Compare this to the circumstances forty years ago, when ITFS was first proposed. Everyone, including the Commission, knew what was intended: the transmission of television programming to schools via microwave. Here, the intended service is undefined except for its technical parameters and even those are purposefully flexible.

Several of those filing seem to see educational broadband as a service that will rely on a single powerful transmitter covering a large service area. That is, they view broadband as little different from the existing ITFS video service.

Yet in fact under the proposed technical rules the broadband service must operate at low power. This means licensees will need multiple transmitters dispersed in a cellular pattern. Such a cellular arrangement will be substantially more complex and more costly to construct and operate than the current ITFS video service. Indeed, such a service may well be beyond the technical and financial ability of many educational institutions.

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<sup>8</sup> Two-Way Report and Order, MM Docket 97-217, 13 FCC Rcd 19112, 19116 (1998).

Nonetheless, the educators filing comments articulate different views of what the new broadband ITFS will be like. For example, Broward County Florida expects “a high-speed broadband network for public schools.”<sup>9</sup> It anticipates a wireless network with connection speeds as high as 45 Mbps.<sup>10</sup> The Miami Dade schools foresee a “wireless broadband network via ITFS to significantly expand and speed student and teacher access to the new instructional methods based on computer based technologies.”<sup>11</sup>

The New York Archdiocese, on the other hand, sees a broadband network as too costly to develop on its own. It says: “Our existing transmitter network was designed to reach the maximum number of schools sited in both an extremely cluttered urban setting (Manhattan) as well as widely scattered rural schools in areas such as Orange and Ulster counties. In both instances, a low-power, cellular system will be extremely costly and feasible only working with a commercial partner.”<sup>12</sup>

South Carolina seems less concerned about cost and says it plans to build some kind of ITFS broadband network statewide: “The final stage of completing our vision of designing and delivering digital interactive educational content is to make it accessible to all of South Carolina. ETV [of South Carolina] is exploring the potential of creating a cellular wireless broadband network that covers the entire state.... The educational benefits of this type of access are endless.”<sup>13</sup>

The commercial parties take a very different view. Rather than merely serve schools and other fixed locations, they want the proposed broadband service to be available for mobile service for voice and data. Motorola, for example, says: “Indeed,

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<sup>9</sup> Comments of the School Board of Broward County p. 8 (September 8, 2003).

<sup>10</sup> Id. at 10-11.

<sup>11</sup> Comments of the School Board of Miami-Dade County, Florida p. 6 (September 8, 2003).

<sup>12</sup> Comments of the Archdiocese of New York pp. 2-3 (September 8, 2003).

<sup>13</sup> Comments of South Carolina Educational Television Network p. 6 (September 8, 2003).

the *NPRM* states that the Commission ‘anticipate[s] that this spectrum will be largely used as a mobile voice and data service.’ Motorola agrees that the suitability of this spectrum for the delivery of broadband services, including mobile uses, is likely to lead to significant use of this band for a range of services, provided that the Commission adopts a more coherent licensing structure that allows mobile operations to be a viable option in this spectrum.”<sup>14</sup>

The Sprint Corporation also believes that the spectrum, if used commercially, will be used in mobile applications: “As testing continues, Sprint hopes to eventually meld services developed in the 2.5 GHz with other services, such as PCS, PCS Vision, and ‘WiFi’ to provide still greater portability and mobility.”<sup>15</sup> Sprint describes the expected service this way:

While first-generation FDD technology required an expensive and time-consuming truck roll and installation of a fixed pizza box-sized antenna on a customer’s rooftop, the next-generation technology that Sprint has worked to develop merely requires inexpensive, customer-installed non-line-of-sight devices, some as small as PC cards that can be plugged directly into the PCMCIA slot on a laptop computer or Personal Digital Assistant, that can be purchased at a retail store (e.g., a Sprint store or Radio Shack) and installed by the subscriber. Through increased simplicity and portability, as well as substantially higher data rates than are available over 3G mobile services, DSL, or cable modem services, Sprint hopes to bring to market services that offer customers a high-speed, portable or mobile service over the 2.5 GHz band that is unlike anything available through current broadband access technologies.<sup>16</sup>

Suffice it to say, the educational and commercial parties see a very different future for how this spectrum will be use. While the commercial parties want a mobile broadband service, no educator has even hinted at a mobile service or suggested how a mobile service could be deemed to further a school’s educational mission.<sup>17</sup>

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<sup>14</sup> Comments of Motorola, Inc. p. 7 (September 8, 2003).

<sup>15</sup> Comments of the Sprint Corporation p. 4 (September 8, 2003).

<sup>16</sup> *Id.* at 3.

<sup>17</sup> Of course, there are at least two ways a school might share a mobile service. First, the school might want students to be able to access the Internet from home and thus want a mobile service, but it would be hard to say this fell within the school’s “educational mission.” Or, a commercial lessee might use the facility to provide high-speed fixed service to schools and a mobile voice/data service to its own customers..

**C. The rule on permissible use proposed in the NPRM is unworkable.**

The proposed rule for permissible use as stated in the NPRM is: “Authorized instructional television fixed station channels must be used to further the educational mission of accredited schools offering formal educational courses to enrolled students. (emphasis added). This rule suffers from the same defect that has plagued ITFS for the past 40 years. The technical rules permit a much broader, much more robust service than the permissible use rules do.

The proposed rule on permissible use was apparently borrowed from the Two-Way proceeding. There the Commission said:

We believe that availability of advanced technologies dictates that it is now time to accord ITFS licensees increased flexibility in determining which transmissions qualify as satisfying ITFS educational usage requirements, so long as such transmissions are in furtherance of the educational mission of an accredited public or private school, college or university, or other eligible institution offering courses to enrolled students. Such uses may include downstream or upstream video, data and voice transmissions.... Furthermore, in light of the myriad of possible uses of the spectrum for courses by accredited schools, we no longer need a separate rule pertaining to where transmissions are not to on-campus receive sites. Because we fully expect several qualifying transmissions to and from homes and other off-campus sites, retention of such a rule would be unduly burdensome to ITFS applicants and licensees.<sup>18</sup>

The problem with borrowing from the Two-Way opinion is that the Commission was still dealing, in theory at least, with a point-to-point service – or, as Sprint pointedly said in its comments, “a fixed pizza box-sized antenna on a customer’s rooftop.” The Commission certainly was not looking at ITFS as a mobile service then.

The proposed rule on permissible use makes little sense for either the high-power video service or low-power broadband services that are contemplated.

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<sup>18</sup> Two-Way Report and Order, MM Docket 97-217, 13 FCC Rcd 19112, 19155-55 (1998).

With respect to the video service, the proposed rule still seems to require that the facility transmit programming to schools or classrooms, a point-to-point application. The only practical difference between the new rule and the current one is that the new rule does not require the programming to be purely instructional in nature. However, as AIB suggested in its initial comments, the new rule would not seem to count as an ITFS use the broadcast of noncommercial, educational programming to the public or the broadcast of non-educational programming to students.

With respect to broadband services, the new rule would be even less helpful. The comments suggest the broadband services may include fixed wireless data, mobile wireless data, and cellular voice telephone. Suppose a licensee leases to a commercial operator who uses the facility for mobile voice and fixed and mobile data transmissions. How is the proposed educational mission test met? Is it enough if the lessee provides free service to schools? What percentage of the traffic must be represented by the schools' use? Would it be enough if the commercial operators distributed cell phones to students and teachers at no cost? Will the 5% test be continued? Should the rules apply to broadband differently from the way they apply to video? That is, under the proposed rule, will it be an educational use if the student uses the ITFS broadband service to surf the Web from home? But, will it also be an educational use if she sits at home and watches non-educational programming from an ITFS video service?

If the New York Archdiocese is correct in believing that under the new rules ITFS licensees will need to let commercial operators build and operate the broadband facilities, then how will the Commission determine whether the station furthers the educational mission of an accredited school? A school's use may simply be one part of a common carrier-like offering. Indeed, from a school's perspective, the wireless ITFS broadband

service may look exactly like the wired service it might get from the cable or telephone company.

For this reason, AIB has suggested that the permissible use rules be as broad as the technical rules. ITFS licenses should be permitted to use the full capabilities of the service. If the service is technically capable of providing cellular phone service to the public, then ITFS licensees should be permitted to use it for that purpose on a noncommercial basis. Their entitlement to a license should not be conditioned upon their offering an artificial and perhaps crippled service in order to meet the permissible use requirements. It is one thing to give ITFS licensees the right to under-utilize the spectrum. It is quite another thing to require them to do this in order to retain their licenses.

The permissible use rule that AIB envisions would mean that all of the Diocese of Brooklyn's programming, all of CTN's programming, and Thirteen/WNET's plan for an emergency information system would be considered ITFS service. Such a rule would permit ITFS to be used to further the public interest. William F. Baker, president of Thirteen, said in the press release announcing its plan for an emergency information dissemination system: "With this innovative project, Thirteen will make a vital contribution to the welfare and safety of our community. And we are hopeful that our work will lead to national deployment of a system that will save lives across America..... Public television was created to serve the people and this unique effort will do just that -- serve the people when they most need it."<sup>19</sup> AIB believes the Commission should encourage rather than restrict such use of ITFS by adopting permissible use rules that clearly allow it.

## **II. The rule on permissible use proposed in the NPRM is contrary to the stated objective of this proceeding.**

The unnecessarily restrictive rule on permissible use that was proposed in the NPRM cannot be squared with the stated objective of this proceeding. The NPRM quoted from the Commission’s Strategic Plan, observing: “[T]his proceeding provides us with an opportunity to further our spectrum management goal to ‘encourage the highest and best use of spectrum domestically and internationally in order to encourage the growth and rapid deployment of innovative and efficient communications technologies and services.’”<sup>20</sup>

AIB believes ITFS licensees should be permitted to use their facilities on a noncommercial basis in whatever way the technology allows. They should be no more constrained in their use of their facilities than noncommercial educational television licensees are. The model should be Rule 73.621(c) which provides: “Noncommercial educational television stations may transmit, educational, cultural and entertainment programs, and programs designed for use by schools and school systems in connection with regular school courses.”<sup>21</sup> In short, the proposed rule on permissible use does not carry out the stated objective of this proceeding.

## **III. Commercial entities should not be eligible for licenses in the spectrum as long as noncommercial use is restricted.**

The NPRM here asked for comment on whether the eligibility rules for ITFS spectrum should be changed to allow commercial entities. Clearly, commercial entities should not be eligible as long as noncommercial entities are restricted in how they can use their licenses. Otherwise, the Commission would not be following its avowed policy

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<sup>19</sup> Attachment A.

<sup>20</sup> NPRM at 20.

<sup>21</sup> 47 CFR 73.621(c).

of allowing market forces to dictate ownership of this spectrum. If it continues to limit how noncommercial licensees may use their facilities, the Commission will be putting its thumb on the scales of the marketplace, tilting the balance towards commercial ownership of this spectrum.

Worse yet, if the Commission limits how noncommercial entities may use ITFS but lets commercial operators apply, it will pave the way for widespread challenges to educational licensees by commercial operators hoping to free up spectrum for commercial use. Commercial and noncommercial uses of this spectrum cannot co-exist if noncommercial use is arbitrarily constrained.

#### **IV. Two-sided auctions should be carefully considered.**

In its previous comments, AIB supported the NPRM's idea of two-sided auctions. However, AIB expressed the concern that because ITFS licenses are subject to long-term leases, licensees could not, as the NPRM suggested, take themselves out of the auction by simply submitting the highest bid. That is, a licensee that wins its own license in the auction will still have to answer to its lessee.

Spectrum Market LLC and the Independent MMDS parties comment on this and other regulatory questions stemming from the many ITFS leases.<sup>22</sup> AIB believes their comments merit consideration. The proposed rules in the NPRM would work a wholesale revision of ITFS. While AIB does not necessarily agree with the specifics of these comments, it does agree that rule changes may require the Commission to address the effect of the new rules on leases.

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<sup>22</sup> Comments of Spectrum Market, LLC (September 8, 2203); Joint Comments of MMDS Parties (September 8, 2003).

## **V. The transition rules should be clarified.**

In its initial comments, AIB suggested the Commission define the rights of existing licensees in the reorganization of the spectrum. In their comments, Stanford and Northeastern universities outline an alternative transition plan to the one contained in the NPRM.<sup>23</sup> They recommend, among other things, that spectrum assignments should be developed by the licensees in each market and that the Commission allow sufficient time for the transition. AIB agrees with the universities that the NPRM underestimates the complexities of reorganizing this spectrum and, therefore, agrees that clearer rules for the transition are needed.

## **VI. Conclusion**

For the foregoing reasons, AIB again urges that the permissible use of ITFS be similar to that of noncommercial educational television, that two-side auctions be considered, and that the transition rules be clarified.

Respectfully submitted,



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<sup>23</sup> Joint Comments of Stanford University and Northeastern University p. 11 (September 8, 2003).

## **Attachment A**

### **Thirteen/WNET New York To Develop Emergency Information Dissemination System"**

#### **THIRTEEN/WNET NEW YORK TO DEVELOP EMERGENCY INFORMATION DISSEMINATION SYSTEM TO PROVIDE CRITICAL DATA TO FIRST RESPONDERS IN NATIONAL DISASTER AND HOMELAND SECURITY SITUATIONS**

National Technology Alliance Selects Thirteen/WNET to Develop Use of Digital Spectrum for Delivering Emergency Information in New York City

Contract Awarded to Thirteen by the National Imagery and Mapping Agency

Rosettex Technology & Ventures Group to Manage Project, Which Will Serve as National Model

NEW YORK, NY -- Thirteen/WNET New York, the flagship public television station of the New York metropolitan area, has received funding from the National Imagery and Mapping Agency (NIMA) to develop a prototype emergency alert system that will make use of Thirteen's digital spectrum for distributing emergency alerts, emergency response information, and command and control information to the public, first responders, and homeland security personnel.

The system is being developed by Thirteen in conjunction with Rosettex Technology & Venutres Group, under the auspices of the National Technology Alliance (NTA).

"The crisis of September 11, 2001 brought Thirteen and New York City together as never before," said William F. Baker, president of Thirteen. "Ever since that fateful day, Thirteen has been determined to harness its transmission resources to provide vital information that will help save lives in the event of a regional emergency. With this innovative project, Thirteen will make a vital contribution to the welfare and safety of our community. And we are hopeful that our work will lead to national deployment of a system that will save lives across America."

The initial award to Thirteen of more than \$500,000, will be used to develop and analyze an urban testbed project utilizing Thirteen's licensed Instructional Television Fixed Service (ITFS) spectrum for effective dissemination of information to first responders acting in national disaster situations.

Television broadcasters have traditionally served the public interest by providing broadcast of emergency information, when needed, to millions of people instantaneously. The current transition to digital broadcasting affords much greater technical capabilities, including two-way transmission to numerous mobile units throughout an urban area. This capability is clearly suited to the needs of emergency responders and for activities related to homeland security. Using its transmitter location on the Empire State Building,

Thirteen is positioned to lead the way in prototyping this new two-way, broadband emergency alert capability under the auspices of the NTA.

The five-year NTA program, which began in 2002, is managed by NIMA, the executive agent of the program for the Department of Defense and the intelligence community, which provided the funding to Thirteen. The broadband emergency alert project will be managed by Rosettex Technology & Ventures Group, a joint venture between Sarnoff Corporation and SRI International.

The ability simultaneously to reach millions of people and broad areas in densely populated urban environments, as well as to provide coverage to sparse rural areas, makes broadcast a critical element of an effective information dissemination system. A terrestrial broadcast television licensee with both analog and digital channel allotments, Thirteen will contribute a portion of the digital spectrum on the ITFS band for development of the system.

The ultimate goal will be to create a hybrid system in which both the ITFS and normal DTV spectrum bands are used to provide a variety of information and two-way communications to first responders. For example, the DTV channel could be used to broadcast traditional emergency alerts to the general public as well as to deliver supplemental datacast information about evacuation routes, emergency treatment center locations or similar emergency information to those with data receivers. At the same time, the ITFS channel could be used to disseminate encrypted data such as building blueprints, procedures for handling dangerous materials and other sensitive information to targeted emergency responders, who in turn will be able to make requests for specific information from the field over the same system.

"This hybrid DTV/ITFS system, built on Thirteen's licensed broadcast spectrum in New York City, will prototype a digital terrestrial infrastructure that will respond to terrorist incidents, natural disasters, or other emergencies prior to the actual need arising," said Becky Aiken, NTA director.

"Public television was created to serve the people and this unique effort will do just that - serve the people when they most need it," said Baker. "Our community has given so much to us over the years. Today, in these anxious times, this is one way for us to give something of concrete value back to those who have so stalwartly supported us.

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About the National Imagery and Mapping Agency The National Imagery and Mapping Agency (NIMA) is a member of the National Intelligence Community and a DoD Combat Support Agency. It provides timely, relevant, and accurate Geospatial Intelligence in support of national security. Geospatial Intelligence is the analysis and visual representation of security-related activities on the Earth. Headquartered in Bethesda, Md., NIMA operates major facilities in the northern Virginia, Washington, D.C., and St. Louis, Mo. areas. In addition, NIMA Support Teams serve customers

around the nation and the world. For more information, visit the Web site at [www.nima.mil](http://www.nima.mil).

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Thirteen/WNET New York is one of the key program providers for public television, bringing such acclaimed series as NATURE, GREAT PERFORMANCES, AMERICAN MASTERS, CHARLIE ROSE, RELIGION & ETHICS NEWSWEEKLY, WIDE ANGLE, STAGE ON SCREEN, EGG THE ARTS SHOW, and CYBERCHASE -- as well as the work of Bill Moyers -- to audiences nationwide. As the flagship public broadcaster in the New York, New Jersey and Connecticut metro area, Thirteen reaches millions of viewers each week, airing the best of American public television along with its own local productions such as The Ethnic Heritage Specials, The New York Walking Tours, NEW YORK VOICES, REEL NEW YORK, and its MetroArts/Thirteen cable arts programming. With educational and community outreach projects that extend the impact of its television productions, Thirteen takes television "out of the box." And as broadcast and digital media converge, Thirteen is blazing trails in the creation of Web sites, enhanced television, CD-ROMs, DVD-ROMs, educational software, and other cutting-edge media products. More information about Thirteen can be found at: [www.thirteen.org](http://www.thirteen.org).

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